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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

DEC 15 2020

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

2:20-CR-179-RMP

12 Plaintiff,

INDICTMENT

13 v.

Vio: 18 U.S.C. § § 2251(a), (e)
Conspiracy to Produce Child
Pornography (Count 1)

14 AUDREE LEANNA PEDERSON and
15 DANIEL AUGUSTINE SOLIS,

16 Defendants.

18 U.S.C. § 2251(a), (e)
Production of Child Pornography
(Count 2)

18 U.S.C. § 2252A(a)(2)(A), (b)(1)
Distribution of Child Pornography
(Counts 3 and 4)

18 U.S.C. § 2253
Forfeiture Allegations

21 The Grand Jury charges:

22 COUNT 1

23 Beginning on or about January 1, 2020, and continuing through on or about
24 February 7, 2020, in the Eastern District of Washington and elsewhere, the Defendants,
25 AUDREE LEANNA PEDERSON and DANIEL AUGUSTINE SOLIS, knowingly and
26 willfully conspired and agreed with each other to knowingly employ, use, persuade,
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1 induce, entice, and coerce Minor 1, a minor boy who was then two years of age, to
2 engage in sexually explicit conduct for the purpose of producing visual depictions of
3 such conduct, knowing and having reason to know that such visual depictions would
4 be transmitted using any means and facility of interstate commerce, namely the
5 Internet, and that such visual depictions were produced using materials that had been
6 mailed, shipped, and transported in and affecting interstate and foreign commerce by
7 any means, including by computer, all in violation of 18 U.S.C. § 2251(a), (e).

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COUNT 2

Beginning on or about January 1, 2020, and continuing through on or about
February 7, 2020, in the Eastern District of Washington, the Defendant, AUDREE
LEANNA PEDERSON, did knowingly employ, use, persuade, induce, entice, and
coerce Minor 1, a minor boy who was then two years of age, to engage in sexually
explicit conduct for the purpose of producing visual depictions of such conduct,
knowing and having reason to know that such visual depictions would be transmitted
using any means and facility of interstate commerce, namely the Internet, and such
visual depictions were produced using materials that had been mailed, shipped, and
transported in and affecting interstate and foreign commerce by any means, including
by computer, all in violation of 18 U.S.C. § 2251(a), (e).

COUNT 3

Beginning on or about January 1, 2020, and continuing through on or about
February 7, 2020, in the Eastern District of Washington, the Defendant, AUDREE
LEANNA PEDERSON, did knowingly distribute child pornography, as defined in 18
U.S.C. § 2256(8)(A), using a means and facility of interstate and foreign commerce,
namely, the Internet, that had been mailed, shipped and transported in interstate
commerce by any means, including by computer, to wit: a visual depiction of Minor
Victim 1, a minor boy who was then two years of age, engaging in sexually explicit

1 conduct, including the lascivious exhibition of his genitals and pubic area, in violation
2 of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).

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4 COUNT 4

5 Beginning on or about February 5, 2020, and continuing through on or about
6 February 8, 2020, in the Eastern District of Washington and elsewhere, the Defendant,
7 DANIEL AUGUSTINE SOLIS, did knowingly distribute child pornography, as
8 defined in 18 U.S.C. § 2256(8)(A), using a means and facility of interstate and foreign
9 commerce, namely, the Internet, that had been mailed, shipped and transported in
10 interstate commerce by any means, including by computer, to wit: a visual depiction of
11 Minor Victim 1, a minor boy who was then two years of age, engaging in sexually
12 explicit conduct, including the lascivious exhibition of his genitals and pubic area, in
13 violation of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).

14 NOTICE OF FORFEITURE ALLEGATIONS

15 The allegations contained in this Indictment are hereby realleged and
16 incorporated by reference for the purpose of alleging forfeitures.

17 Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of 18
18 U.S.C § 2251(a), (e), or 18 U.S.C § 2252A(a)(2), (b)(1), as charged in Counts 1-4 of
19 this Indictment, the Defendants, AUDREE LEANNA PEDERSON and/or DANIEL
20 AUGUSTINE SOLIS, shall each forfeit to the United States of America any visual
21 depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of that
22 chapter, or any book, magazine, periodical, film, videotape, or other matter which
23 contains any such visual depiction, which was produced, transported, mailed, shipped
24 or received in violation of this chapter; any property, real or personal, constituting or
25 traceable to gross profits or other proceeds obtained from such offenses; and, any
26 property, real or personal, used or intended to be used to commit or to promote the
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1 commission of such offenses, or any property traceable to such property. The property
2 to be forfeited includes, but is not limited to:

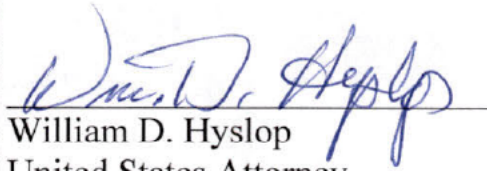
3 - A blue Samsung Galaxy Note 8 cellular telephone.

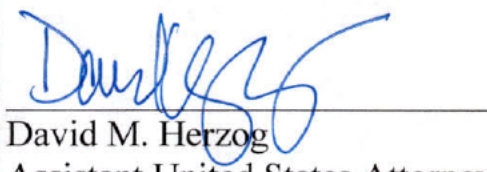
4 If any of the property described above, as a result of any act or omission of the
5 Defendant:

- 6 a. cannot be located upon the exercise of due diligence;
7 b. has been transferred or sold to, or deposited with, a third party;
8 c. has been placed beyond the jurisdiction of the Court;
9 d. has been substantially diminished in value; or
10 e. has been commingled with other property which cannot be divided
11 without difficulty,

12 the United States of America shall be entitled to forfeiture of substitute property
13 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).
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16 DATED this 15 day of December, 2020.

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24 William D. Hyslop
25 United States Attorney

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28 David M. Herzog
Assistant United States Attorney